



Your business
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 27, 2014

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2014 ETC Annual Report of Smart City Telecommunications, LLC
Study Area Code 210330**

Dear Ms. Dortch:

On behalf of Smart City Telecommunications, LLC (“Smart City”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ Smart City seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.202(a).



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June 27, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2014 ETC Annual Report of Smart City Telecommunications, LLC
Study Area Code 210330
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Smart City Telecommunications, LLC (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).³
2. Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan (“Five-Year Plan”) which is contained in the attachment to the 2014 Report.⁴
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" and last name "Kuykendall" clearly distinguishable.

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|----------------------------|
| <010> | Study Area Code | 210330 |
| <015> | Study Area Name | SMART CITY TEL LLC |
| <020> | Program Year | 2015 |
| <030> | Contact Name: Person USAC should contact with questions about this data | Debbie Huttenhower |
| <035> | Contact Telephone Number: Number of the person identified in data line <030> | 4078286656 ext. |
| <039> | Contact Email Address: Email of the person identified in data line <030> | dhuttenhower@smartcity.com |

| ANNUAL REPORTING FOR ALL CARRIERS | | 54.313 Completion Required | 54.422 Completion Required |
|-----------------------------------|--|----------------------------------|----------------------------------|
|-----------------------------------|--|----------------------------------|----------------------------------|

| | | | | |
|--------|---|---|-------------------------------------|-------------------------------------|
| <100> | Service Quality Improvement Reporting | (complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <200> | Outage Reporting (voice) | (complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <210> | <input checked="" type="checkbox"/> <-- check box if no outages to report | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <300> | Unfulfilled Service Requests (voice) | 0 | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <310> | Detail on Attempts (voice) | (attach descriptive document) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <320> | Unfulfilled Service Requests (broadband) | 2 | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <330> | Detail on Attempts (broadband) | (attach descriptive document) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <400> | Number of Complaints per 1,000 customers (voice) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <410> | Fixed | 0.0 | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <420> | Mobile | 0.0 | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <430> | Number of Complaints per 1,000 customers (broadband) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <440> | Fixed | 0.0 | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <450> | Mobile | 0.0 | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <500> | Service Quality Standards & Consumer Protection Rules Compliance | (check to indicate certification) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <510> | (attached descriptive document) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <600> | Functionality in Emergency Situations | (check to indicate certification) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <610> | (attached descriptive document) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <700> | Company Price Offerings (voice) | (complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <710> | Company Price Offerings (broadband) | (complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <800> | Operating Companies and Affiliates | (complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <900> | Tribal Land Offerings (Y/N)? | (if yes, complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <1000> | Voice Services Rate Comparability | (check to indicate certification) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <1010> | (attach descriptive document) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <1100> | Terrestrial Backhaul (Y/N)? | (if not, check to indicate certification) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <1110> | (complete attached worksheet) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <1200> | Terms and Condition for Lifeline Customers | (complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

| | | | | |
|--------|---|-----------------------------------|-------------------------------------|-------------------------------------|
| <2000> | Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers | (check to indicate certification) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <2005> | (complete attached worksheet) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

| | | | |
|--------|-----------------------------------|-------------------------------------|-------------------------------------|
| <3000> | (check to indicate certification) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <3005> | (complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

(100) Service Quality Improvement Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|--|---|
| <010> | Study Area Code | 210330 |
| <015> | Study Area Name | SMART CITY TEL LLC |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Debbie Huttenhower |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 4078286656 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dhuttenhower@smartcity.com |
| <110> | Has your company received its ETC certification from the FCC? | <input checked="" type="radio"/> (yes / no) |
| <111> | If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC? | <input type="radio"/> (yes / no) |

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

| | | |
|-------|---|--------------------------|
| <113> | Maps detailing progress towards meeting plan targets | <input type="checkbox"/> |
| <114> | Report how much universal service (USF) support was received | <input type="checkbox"/> |
| <115> | How (USF) was used to improve service quality | <input type="checkbox"/> |
| <116> | How (USF) was used to improve service coverage | <input type="checkbox"/> |
| <117> | How (USF) was used to improve service capacity | <input type="checkbox"/> |
| <118> | Provide an explanation of network improvement targets not met in the prior calendar year. | <input type="checkbox"/> |

| | | |
|-------|---|----------------------------|
| <010> | Study Area Code | 210330 |
| <015> | Study Area Name | SMART CITY TEL LLC |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Debbie Huttenhower |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 4078286656 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dhuttenhower@smartcity.com |

[illegible]

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|----------------------------|
| <010> | Study Area Code | 210330 |
| <015> | Study Area Name | SMART CITY TEL LLC |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Debbie Huttenhower |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 4 078286656 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dhuttenhower@smartcity.com |

| |
|----------|
| 1/1/2014 |
| 14.0 |

| | Residential Local Service Charge Effective Date |
|-------|--|
| <701> | Single State-wide Residential Local Service Charge |
| <702> | |

[illegible]

[illegible]

**(800) Operating Companies
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|------------------------------------|
| <010> | Study Area Code | 210330 |
| <015> | Study Area Name | SMART CITY TEL LLC |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Debbie Huttenhower |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 4078286656 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dhuttenhower@smartcity.com |
| <810> | Reporting Carrier | Smart City Telecommunications, LLC |
| <811> | Holding Company | Smart City Finance |
| <812> | Operating Company | Smart City Telecommunications, LLC |

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|----------------------------|
| <010> | Study Area Code | 210330 |
| <015> | Study Area Name | SMART CITY TEL LLC |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Debbie Huttenhower |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 4078286656 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dhuttenhower@smartcity.com |

| | |
|-------|------------------------------------|
| <910> | Tribal Land(s) on which ETC Serves |
|-------|------------------------------------|

| | |
|-------|---|
| <920> | Tribal Government Engagement Obligation |
|-------|---|

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

| |
|----------------------------|
| Select (Yes, No, NA) |
| |
| |
| |
| |
| |
| |
| |
| |
| |

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|----------------------------|
| <010> | Study Area Code | 210330 |
| <015> | Study Area Name | SMART CITY TEL LLC |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Debbie Huttenhower |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 4078286656 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dhuttenhower@smartcity.com |

☐

Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

☐

Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

| | | |
|--|--|---|
| (1200) Terms and Condition for Lifeline Customers | | FCC Form 481 |
| Lifeline | | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| Data Collection Form | | July 2013 |

| | | |
|-------|---|----------------------------|
| <010> | Study Area Code | 210330 |
| <015> | Study Area Name | SMART CITY TEL LLC |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Debbie Huttenhower |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 4078286656 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dhuttenhower@smartcity.com |

| | | | |
|--------|--|-----------------------------|---------------------------|
| <1210> | Terms & Conditions of Voice Telephony Lifeline Plans | <div>210330f11210.pdf</div> | Name of Attached Document |
| <1220> | Link to Public Website | HTTP | |

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

| | | |
|--------|---|-------------------------------------|
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> | Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
| <1223> | Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |

| | | |
|--|--|---|
| (2000) Price Cap Carrier Additional Documentation | | FCC Form 481 |
| Data Collection Form | | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i> | | July 2013 |

| | | |
|-------|---|----------------------------|
| <010> | Study Area Code | 210330 |
| <015> | Study Area Name | SMART CITY TEL LLC |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Debbie Huttenhower |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 4078286656 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dhuttenhower@smartcity.com |

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

| | | |
|--|---|--------------------------|
| Incremental Connect America Phase I reporting | | |
| <2010> | 2nd Year Certification {47 CFR § 54.313(b)(1)} | <input type="checkbox"/> |
| <2011> | 3rd Year Certification {47 CFR § 54.313(b)(2)} | <input type="checkbox"/> |
| Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)} | | |
| <2012> | 2013 Frozen Support Certification | <input type="checkbox"/> |
| <2013> | 2014 Frozen Support Certification | <input type="checkbox"/> |
| <2014> | 2015 Frozen Support Certification | <input type="checkbox"/> |
| <2015> | 2016 and future Frozen Support Certification | <input type="checkbox"/> |
| Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)} | | |
| <2016> | Certification Support Used to Build Broadband | <input type="checkbox"/> |
| Connect America Phase II Reporting {47 CFR § 54.313(e)} | | |
| <2017> | 3rd year Broadband Service Certification | <input type="checkbox"/> |
| <2018> | 5th year Broadband Service Certification | <input type="checkbox"/> |
| <2019> | Interim Progress Certification | <input type="checkbox"/> |
| <2020> | Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. | |

| | | |
|--------|--|--|
| <2021> | Interim Progress Community Anchor Institutions | |
|--------|--|--|

Name of Attached Document Listing Required Information

REDACTED FOR PUBLIC INSPECTION

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

(3000) Rate Of Return Carrier Additional Documentation Data Collection Form

| | | |
|-------|---|-----------------------------|
| <010> | Study Area Code | 210330 |
| <015> | Study Area Name | SMART CITY TEL LLC |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Debbie Huttenhower |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 4078286656 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dhuttenhower@smartcityv.com |

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) **Progress Report on 5 Year Plan**
Milestone Certification (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(3014) If yes, does your company file the RUS annual report

(Yes/No)

(Yes/No)

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, Is your company audited?

(Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information

210330E13026.pdf

Name of Attached Document Listing Required Information

| | |
|---|--|
| Certification - Reporting Carrier Data Collection Form | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|---|--|

| | | |
|-------|---|----------------------------|
| <010> | Study Area Code | 210330 |
| <015> | Study Area Name | SMART CITY TEL LLC |
| <020> | Program Year | 2015 |
| <030> | Contact Name - Person USAC should contact regarding this data | Debbie Huttenhower |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 4078286656 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | dhuttenhower@smartcity.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

| | |
|---|--------------------------------|
| Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients | |
| I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. | |
| Name of Reporting Carrier: | |
| Signature of Authorized Officer: | Date |
| Printed name of Authorized Officer: | |
| Title or position of Authorized Officer: | |
| Telephone number of Authorized Officer: | |
| Study Area Code of Reporting Carrier: | Filing Due Date for this form: |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

| | |
|---|--|
| Certification - Agent / Carrier Data Collection Form | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|---|--|

| | |
|---|----------------------------|
| <010> Study Area Code | 210330 |
| <015> Study Area Name | SMART CITY TEL LLC |
| <020> Program Year | 2015 |
| <030> Contact Name - Person USAC should contact regarding this data | Debbie Huttenhower |
| <035> Contact Telephone Number - Number of person identified in data line <030> | 4078286656 ext. |
| <039> Contact Email Address - Email Address of person identified in data line <030> | dhuttenhower@smartcity.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

| | |
|--|--|
| Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier | |
| I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate. | |
| Name of Authorized Agent: <u>John Staurulakis, Inc.</u> | |
| Name of Reporting Carrier: <u>SMART CITY TEL LLC</u> | |
| Signature of Authorized Officer: <u>CERTIFIED ONLINE</u> | Date: <u>06/26/2014</u> |
| Printed name of Authorized Officer: <u>James Schumacher</u> | |
| Title or position of Authorized Officer: <u>VP-Finance & Administration</u> | |
| Telephone number of Authorized Officer: <u>4078286656 ext.</u> | |
| Study Area Code of Reporting Carrier: <u>210330</u> | Filing Due Date for this form: <u>07/01/2014</u> |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

TO BE COMPLETED BY THE AUTHORIZED AGENT:

| | |
|--|--|
| Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier | |
| I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate. | |
| Name of Reporting Carrier: <u>SMART CITY TEL LLC</u> | |
| Name of Authorized Agent or Employee of Agent: <u>John Staurulakis, Inc.</u> | |
| Signature of Authorized Agent or Employee of Agent: <u>CERTIFIED ONLINE</u> | Date: <u>06/26/2014</u> |
| Printed name of Authorized Agent or Employee of Agent: <u>Lans Chase</u> | |
| Title or position of Authorized Agent or Employee of Agent: <u>Staff Director - Regulatory Affairs</u> | |
| Telephone number of Authorized Agent or Employee of Agent: <u>7705692105 ext.1</u> | |
| Study Area Code of Reporting Carrier: <u>210330</u> | Filing Due Date for this form: <u>07/01/2014</u> |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

Attachments

REDACTED – FOR PUBLIC INSPECTION

SMART CITY TELECOMMUNICATIONS LLC (SAC 210330)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

Smart City Telecommunications, LLC
Demonstration of Complying with Applicable Service Quality Standards and
Consumer Protection Rules for Voice and Broadband

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Smart City Telecommunications, LLC (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) Filing of Service Schedules pursuant to the requirements of Florida Administrative Code § 25-4.0341 and Florida Statutes, Title XXVII, Chapter 364 Telecommunications Companies, 364.04, which disclose rates to customers; (2) adherence to Florida state consumer protection requirements governing telephone providers for Compliance with Anti-Slamming Procedures as adopted in Florida Administrative Code § 25-4.118; and (3)

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

compliance with CPNI as identified in Florida Statutes Title XXVII, Chapter 364, 364.24, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

Smart City Telecommunications, LLC
Demonstration of Ability to Function in Emergency Situations for Voice and
Broadband

Smart City Telecommunications, LLC (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹. The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. Company’s standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur. Further, Company has implemented and maintains a Disaster Recovery Plan.

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

<701> | Residential Local Service Charge Effective Date |

| | Residential Local Service Charge Effective Date | Single State-wide Residential Local Service Charge |
|-------|---|--|
| <701> | | |
| <702> | | |

<703>

[illegible]

Phone Service Pages



<http://www.smartcitytelecom.com/residential/residential-voice>

general information

Customer Service

Correspondence Mailing Address:

Smart City Telecom
PO Box 22555
Lake Buena Vista, FL 32830-2555

Lifeline Assistance

Qualified residential telephone subscribers are eligible for the Lifeline Assistance Program. This program provides discounts on basic telephone services. This program offers assistance on one (1) telephone line per household at the customer's principal residence. Customers receiving benefits from any of the following programs may qualify for these savings:

- Supplemental Security Income (SSI)
- Medicaid
- Low-Income Home Energy Assistance (LIHEAP)
- Federal Public Housing Assistance (Section 8)
- Food Stamps
- Bureau of Indian Affairs programs
- Temporary Assistance to Needy Families (TANF)
- Household income no more than 150% of the U.S. Poverty Guidelines
- National School Lunch (NSL) Program (free meals program only)

If you have any questions about program eligibility or would like to sign up for Lifeline Assistance, please contact our Customer Care Team at 407-828-6700 or service@smartcity.com.

Qualified residential subscribers will receive a maximum Lifeline credit of \$12.75 per month on their local telephone bill. Contact a Smart City Telecom Account Representative for more details.

Línea Vital

El programa de la Línea Vital está disponible a suscriptores residenciales que reúnan los requisitos necesarios. Este programa está diseñado para asegurar el servicio telefónico básico. El Programa ofrece asistencia para una línea telefónica, por residencia, en la residencia principal del cliente. Consumidores que estén recibiendo asistencia de cualquiera de los siguientes programas podrían calificar para este beneficios:

- Seguridad de Ingresos Suplementarios (SSI)
- Medicaid
- Asistencia de Energía Para Hogares de Bajos Ingresos (LIHEAP)
- Asistencia Federal para Viviendas Publicas (Sección 8)
- Cupones de Alimentos
- Negociado de Asuntos Indígenas
- Asistencia temporaria para familias necesitadas
- Ingreso Familiar de no más del 150% de las guías federales para nivel de pobreza
- Programa De Almuerzo Escolar Gratis de el Programa Nacional De Almuerzo Escolar (NSL)

Si tiene alguna pregunta sobre la elegibilidad para participar en estos programas, o si desea solicitar los mismos, favor de comunicarse con nuestro Departamento de Servicio al Cliente a 407-828-6700 o por correo electrónico a service@smartcity.com

Florida Local Advocacy Council

Protecting and advocating for a better quality of life for Floridians with unique needs 1-800-342-082

Information correct as of September 2012



GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
6th Revised Sheet 1
Canceling 5th Revised Sheet 1

ISSUED: January 24, 2007
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

EFFECTIVE: February 23, 2007

BASIC LOCAL EXCHANGE SERVICE

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GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
4th Revised Sheet 2
Canceling 3rd Revised Sheet 2

ISSUED: July 1, 2002
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

EFFECTIVE: July 16, 2002

BASIC LOCAL EXCHANGE SERVICE

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GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
6th Revised Sheet 1
Canceling 5th Revised Sheet 1

ISSUED: May 31, 2013
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

EFFECTIVE: June 1, 2013

BASIC LOCAL EXCHANGE SERVICE

A. GENERAL

1. Touch-tone calling service is provided within the Lake Buena Vista and Celebration Exchanges for the origination of telephone calls. The Company is designed for the use of electronic equipment and touch-tone service. The Lake Buena Vista and Celebration Exchanges will only offer or connect with equipment which provides for 100% touch-tone calling. Only electronic switching equipment is contemplated in order to provide service of the latest technology to the telephone using public of the Lake Buena Vista and Celebration Exchanges.
2. The Exchange Service Areas for the Lake Buena Vista and Celebration Exchanges as appropriate are identified on maps filed as a supplement to this Tariff.
3. The rules, regulations and rates for service and facilities not specifically shown in this section are detailed in other sections of this Tariff.

B. MONTHLY EXCHANGE RATES

1. Lake Buena Vista Exchange

a. Local Calling Area

The rates specified herein, payable monthly in advance, entitle subscribers to an unlimited number of local telephone messages to all stations bearing the serving exchange of Lake Buena Vista and additional exchanges or portions of the exchanges of Apopka, Celebration, Clermont, East Orange, Montverde, Orlando, Reedy Creek, Windermere, Winter Garden and Winter Park. Appropriate service connection and Installation charges will also apply.

b. Residence and Business Main Service Rates

For the classes of service here indicated where facilities are available, the following rates apply:

| | | Monthly Rate | Access Line Connection Charge | |
|----|----------------------------------|-----------------|-------------------------------------|-----|
| 1. | Residence Main Flat-Rate Service | \$ 14.00 | \$10.21 | (I) |
| 2. | Business Main Flat-Rate Service | \$ 18.03 | \$10.21 | |

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
6th Revised Sheet 2
Canceling 5th Revised Sheet 2

ISSUED: April 16, 2004
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

EFFECTIVE: May 1, 2004

BASIC LOCAL EXCHANGE SERVICE

B. MONTHLY EXCHANGE RATES (cont'd)

1. Lake Buena Vista Exchange

b. Residence and Business Main Service Rates (cont'd)

| | | <u>Monthly</u> <u>Rate</u> | <u>Access Line</u> <u>Connection</u> <u>Charge</u> | |
|----|--|-------------------------------|--|-----|
| 3. | PBX Trunk Flat-Rate Service (inward, outward, two way, per trunk) | \$32.00 | \$50.50 | (I) |
| 4. | Key Main Flat-Rate Service | \$32.00 | \$33.70 | (I) |
| 5. | Message Rate Plan | | | |

Order No. 24595 in Docket No. 891239-TL establishes a per call message rate plan for exchanges with rate centers within a 1-10 mileage band of each other. Each call between the Lake Buena Vista-West Kissimmee exchanges will be charged a flat rate of \$.26 per call of unlimited duration. Such calls will be dialed as ten (10) digit local calls.

The message rate plan includes calls dialed or placed through an operator from all individual access lines and PBX trunks, and customer-owned and Company pay telephones. Operator assisted local call charges will be applicable to plan calls placed through an operator.

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
6th Revised Sheet 2.1
Canceling 5th Revised Sheet 2.1

ISSUED: May 31, 2013
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

EFFECTIVE: June 1, 2013

BASIC LOCAL EXCHANGE SERVICE

B. MONTHLY EXCHANGE RATES (cont'd)

2. Celebration Exchange

a. Local Calling Area

The rates specified herein, payable monthly in advance, entitle subscribers to an unlimited number of local telephone messages to all stations bearing the serving exchange of Celebration and additional exchanges or portions of the exchanges of Apopka, Clermont, East Orange, Kissimmee, Lake Buena Vista, Montverde, Orlando, Reedy Creek, St. Cloud, West Kissimmee, Windermere, Winter Garden and Winter Park. Appropriate service connection and installation charges will also apply.

b. Residence and Business Main Service Rates

For the classes of service here indicated where facilities are available, the following rates apply:

| | | Monthly Rate | Access Line Connection Charge | |
|----|---|-----------------|-------------------------------------|-----|
| 1. | Residence Main Flat-Rate Service | \$14.00 | \$10.21 | (I) |
| 2. | Business Main Flat-Rate Service | \$25.56 | \$10.21 | |
| 3. | PBX Trunk Flat-Rate Service (inward, outward, two-way per trunk) | \$52.00 | \$50.50 | |
| 4. | Key Main Flat-Rate Service | \$28.00 | \$33.80 | |

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
1st Revised Sheet 2.2
Canceling Original Sheet 2.2

ISSUED: January 24, 2007
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

EFFECTIVE: February 23, 2007

BASIC LOCAL EXCHANGE SERVICE

3. Bundled Local Services Package - Residential

a. General

- (1) Company's Residential Bundled Local Services Package is an optional residential service enrollment plan that permits customers to receive residential local exchange service and certain local non-basic services and features otherwise individually available in this Tariff, for each residential local exchange service line provided, for a flat monthly rate, regardless of the exchange in which the customer is located.
- (2) Customer subscription in the Residential Bundled Local Services Package includes required and automatic subscription in Company's Smart City Residential Unlimited Minutes bundled long distance services calling package at the terms, conditions, and additional rates and charges specified in Section 3.4.5 of Company's Florida Telecommunications Tariff for that service. (T)
- (3) Residential Bundled Local Services Package customers may also subscribe to Company's voice mail service at a special bundled package services rate.
- (4) Company's Residential Bundled Local Services Package consists of:
 - (a) Flat Rate Residential Local Exchange Service, which includes unlimited calling to all access lines within the serving exchange, the additional exchanges in the associated Extended Area Service ("EAS") or Local Calling Area identified in Section A3.B. of this Tariff, and the additional exchanges in the Extended Calling Services ("ECS") categories specified in Section A3.F. of this Tariff; and
 - (b) Unlimited use by the customer of the following custom calling services and features described in Section A13 of the Tariff:
 - (1) Call Forwarding
 - (2) Call Waiting
 - (3) Caller ID Deluxe
 - (4) Call Waiting Display
 - (5) 3 Way Calling
 - (6) Call Return

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
1st Revised Sheet 2.3
Canceling Original Sheet 2.3

ISSUED: January 24, 2007
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

EFFECTIVE: February 23, 2007

BASIC LOCAL EXCHANGE SERVICE

3. Bundled Local Services Package – Residential (cont'd)

a. General (cont'd)

(4) (cont'd)

- (c) Automatic subscription in Company's Smart City Residential Unlimited Minutes bundled long distance services calling package at the terms, conditions, and additional rates specified in Section 3.4.5 of Company's Florida Telecommunications Tariff for that service.

(T)
|
(T)

b. Regulations

- (1) Residential Bundled Local Services Package is not available to those residential customers whose home phone line is classified as a "commercial", "business", "public" or "semi-public" line. Subscriber's phone line must not be in housing associated with educational institutions, and subscribers may not use this service for commercial use or for connection to the Internet, for other data services (including facsimile transmissions), or for any other use that does not involve a person to person conversation or voice message. If Company determines the service is not being used for individual residential service, or in any other way violates the restrictions of their service, Company may withdraw the subscriber's eligibility for this service and/or suspend or terminate the subscriber's service.
- (2) Residential Bundled Local Services Package customers may terminate their enrollment in this package at any time upon notice to the Company with termination being effective on the last day of the then existing month.
- (3) Unless terminated by the customer or the Company, a customer will remain Enrolled in the Residential Bundled Local Services Package, as it may be amended from time to time, with any applicable changes in rate, for as long as the package continues to be offered by the Company.
- (4) Service Charges, as described in Section A4 of this Tariff, apply to requests for new and additional package lines, and moves of existing lines. Service Charges will not apply when this package replaces or is a conversion from existing local exchange services.

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
1st Revised Sheet 2.4
Canceling Original Sheet 2.4

ISSUED: January 24, 2007
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

EFFECTIVE: February 23, 2007

BASIC LOCAL EXCHANGE SERVICE

3. Bundled Local Services Package – Residential (cont'd)

b. Regulations (cont'd)

- (5) All rules, regulations, and limitation specified in other sections of this Tariff apply to the respective services and/or features included as part of this service.
- (6) Residential Bundled Local Services Package customers are not eligible for promotion offerings associated with the individual services included in the package, unless specifically provided for in a promotional offering.
- (7) Prices of the individual services in the Residential Bundled Local Services Package may be higher or lower than the packaged offering.

c. Rates and Charges

| | <u>Monthly Rate</u> | (T) |
|---|---------------------|-----|
| (1) Residential Bundled Local Services Package, per residential local exchange line (excludes Smart City Residential Unlimited Minutes bundled long distance calling service) | \$18.85 | (R) |

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
7th Revised Sheet 3
Canceling 6th Revised Sheet 3

ISSUED: April 1, 2004
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

EFFECTIVE: May 1, 2004

BASIC LOCAL EXCHANGE SERVICE

B. MONTHLY EXCHANGE RATES (cont'd)

(D)

(D)

(M)

(M)

C. DIRECTORY ASSISTANCE SERVICE

1. General

- a. The Telephone Company furnishes Directory Assistance Service for the purpose of aiding subscribers in obtaining telephone numbers.
- b. The rates set forth following apply when subscribers of the Telephone Company request assistance in determining and obtaining telephone numbers of other subscribers or persons (1) who are located in the same local calling area; or (2) who are not located in the same local calling area or Home Numbering Plan Area (HNPA) as the requesting subscriber's serving exchange.
- c. There will be no charge for local calling area Directory Assistance Service calls received from customers with a physical or mental impairment rendering them unable to use the telephone directory.

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
4th Revised Sheet 4
Canceling 3rd Revised Sheet 4

ISSUED: April 16, 2004
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

EFFECTIVE: May 1, 2004

BASIC LOCAL EXCHANGE SERVICE

C. DIRECTORY ASSISTANCE SERVICE (cont'd)

1. General (cont'd)

d. Calls to Long Distance Directory Assistance are charged for at the appropriate rate.

2. Rates

(a) Local Calling Area

(1) A charge of \$.35 is applicable for each call to Directory Assistance Service made by a subscriber, except as noted above and pursuant to the following conditions. (I)

(2) A subscriber is allowed three (3) Directory Assistance Service calls per billing period per access line or PBX trunk without charge. Any Directory Assistance Service calls made by a subscriber beyond the three (3) call allowance will be charged at the \$.35 rate. (I)

(3) A maximum of two (2) telephone numbers may be requested on each Directory Assistance Service call.

(b) Outside the Local/Home Numbering Plan Area

(1) A charge of \$.90 is applicable for each call to Directory Assistance Service. (I)

(2) A maximum of two (2) telephone numbers may be requested on each call.

(c) For PATS Providers

(1) A charge of \$.40 is applicable for each call to Directory Assistance Service. (I)

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
Original Sheet 4.1

ISSUED: April 2, 1999
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

EFFECTIVE: April 17, 1999

BASIC LOCAL EXCHANGE SERVICE

D. OPERATOR ASSISTED LOCAL CALLS

(M)

+

1. All types of local exchange service have local calling areas as specified in A3.B. of this Tariff which are the areas that can be called on a flat-rate basis (no charge for individual calls), on a local coin call rate basis, or on a measured or message rate basis. (T)
2. Local dial calls must be dialed and completed without the assistance of a Company operator and must be billed to the originating telephone when a charge is applicable. Otherwise, operator assistance charges will apply to the call, in addition to the local dial rate. (T)
3. The following service charges apply in addition to the local dial rate applicable for operator assisted local calls from Company-owned coin telephones. The service charges are also applicable to operator assisted local calls from customer-owned pay telephones.
 - a. Station-to-station customer dialed calling card (credit card) local call \$.75
 - b. Station-to-station operator assisted sent-paid, collect, third number, and non-customer dialed credit card calls \$1.00
 - c. Person-to-person operator assisted local call \$2.50
4. In addition to the service charge, all local coin calls utilizing operator handling services will be at the local coin rate. (M)(C)

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
3rd Revised Sheet 5
Canceling 2nd Revised Sheet 5

ISSUED: July 31, 2012
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

EFFECTIVE: August 1, 2012

BASIC LOCAL EXCHANGE SERVICE

D. OPERATOR ASSISTED CALLS (cont'd)

5. The following Operator Assisted Local Calls are exempted from the service charge:
 - a. Calls to designated Company numbers for official telephone business.
 - b. Emergency calls to recognized authorized civil agencies.
 - c. Those cases where a Company operator provides assistance to:
 - (1) Re-establish a call which has been interrupted after the called number has been reached.
 - (2) Reach the called telephone number where facility problems prevent customer dial completion.
 - (3) Place a non-coin, sent paid call for a calling party who identifies himself as being handicapped and unable to dial the call because of his handicap.

E. LOCAL EXCHANGE EXCEPTIONS

1. Lifeline Assistance
 - a. General
 - (1) Lifeline Assistance is a program sponsored by the FCC which provides reduction, in the form of certain credits, in the price of basic local residential exchange access line service to qualifying low-income subscribers. Effective August 1, 2012, the Lifeline Assistance Program provides for a federal credit of \$9.25 per month (the current FCC authorized rate), and a state credit in the amount of \$3.50 per month, for a total monthly credit of \$12.75, to qualified subscribers.

(C)

(C)

(M)

(M)

Material previously on this Sheet is now located on Original Sheet 5.1.

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
Original Sheet 5.1

ISSUED: July 31, 2012
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

EFFECTIVE: August 1, 2012

BASIC LOCAL EXCHANGE SERVICE

E. LOCAL EXCHANGE EXCEPTIONS (cont'd)

1. Lifeline Assistance (cont'd)

b. General (cont'd)

- (2) The federal and state credits are applied to the local service bills for qualified residential recipients of public assistance who apply for the credits and authorize agency verification of their participation in, and/or authorize verification that a member of the residential recipient's household participates in at least one of the following programs:

Supplemental Security Income (SSI), Food Stamps, Medicaid, Federal Public Housing Assistance or Section 8, Low-Income Home Energy Assistance Program (LIHEAP), Temporary Assistance to Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), and National School Lunch (NSL) Program (free meals program only).

- (3) Additionally, subscribers not receiving benefits under one of the preceding programs, and whose total gross annual income does not exceed 150% of the Federal poverty guidelines, meet the requirements of a state established means test may apply directly to the Office of Public Counsel (OPC) for eligibility certification.

(N)

(N)

(C)

(C)

(T)

(T)

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
2nd Revised Sheet 6
Canceling 1st Revised Sheet 6

ISSUED: March 17, 2000
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

EFFECTIVE: April 1, 2000

BASIC LOCAL EXCHANGE SERVICE

E. LOCAL EXCHANGE EXCEPTIONS (cont'd)

2. Applications and Regulations

Guidelines for implementation of this Program are as follows:

(a) Certification Procedures

All applications for Lifeline Assistance are subject to verification with the state agency responsible for administration of the qualifying program.

(b) Processing Procedures

The Company will process all applications and apply the appropriate credit on the subscriber's monthly bill.

(3) Verification Procedures

The Company will reconcile and confirm eligibility periodically, at a minimum semiannually, by providing the agency with a computer tape (directly or through a third party) of all credit recipients. A verification of eligible recipients will be made. The credit will be discontinued on the bill following written notification to the subscriber of ineligibility.

(4) Lifeline Assistance is available for one telephone line per residence, at the subscriber's principle place of residence.

(5) Toll blocking service is available to Lifeline Assistance subscriber's at no charge.

(6) Lifeline Assistance may not be disconnected for non-payment of toll charges however, toll service may be disconnected for non-payment of toll charges. (T)

(7) Deposit requirements do not apply to Lifeline Assistance subscribers if toll blocking is employed.

(8) The Company shall provide Lifeline Assistance to eligible subscribers who have been previously disconnected for nonpayment of their telephone bills, provided that those customers also subscribe to toll blocking service. (N) + (N)

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
Original Sheet 6.1

ISSUED: March 17, 2000
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

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BASIC LOCAL EXCHANGE SERVICE

E. LOCAL EXCHANGE EXCEPTIONS (cont'd)

(N)
+

1. Lifeline Assistance (cont'd)

b. Applications and Regulations (cont'd)

Guidelines for implementation of this program are as follows: (cont'd)

- (9) The Company will not refuse to connect, reconnect, or provide Lifeline Assistance to an eligible subscriber because of unpaid toll charges or local charges other than those for basic local service. However, a Lifeline Assistance subscriber who has been disconnected for non-payment under a prior payment arrangement for paying past due bills, may be required by the Company to satisfy those arrangements prior to reconnection of service.
- (10) The Company may require an eligible Lifeline Assistance subscriber to establish payment arrangements for outstanding debt associated with basic local service and associated taxes and fees, said payment arrangements to be made for a period of not less than four (4) months.
- (11) The Company will not require payment arrangements to be made by an eligible Lifeline Assistance subscriber on other unpaid amounts as a condition of receiving basic local service. However, the Company is not precluded from collecting other portions of the outstanding debt from Lifeline Assistance subscribers by using any other methods as are customary for the Company for collection of outstanding debt from non-Lifeline Assistance subscribers.
- (12) Any payment made by Lifeline Assistance subscribers on past-due amounts will first be credited to unpaid basic local service charges.
- (13) If a Lifeline Assistance subscriber fails to pay charges for basic local service, the subscriber's Lifeline Assistance service may be disconnected by the Company. The subscriber will then be treated in the same manner as any other existing Lifeline Assistance subscriber with regard to reconnection after a disconnect for nonpayment.
- (14) The Company may decline to provide other local services, including but not limited to, ancillary services, if a Lifeline Assistance subscriber has outstanding debt for local service. Such other local services may not be declined for non-payment of toll services.

(N)

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
1st Revised Sheet 6.2
Canceling Original Sheet 6.2

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BASIC LOCAL EXCHANGE SERVICE

E. LOCAL EXCHANGE EXCEPTIONS (cont'd)

1. Lifeline Assistance (cont'd)

b. Applications and Regulations (cont'd)

Guidelines for implementation of this program are as follows (cont'd)

(15) The Company may require toll blocking if a Lifeline Assistance subscriber has prior unpaid toll charges.

(16) For Lifeline Assistance subscribers subject to mandatory toll blocking as a result of unpaid toll charges, the Company may require payment of all unpaid toll charges and an adequate deposit prior to the removal of toll blocking.

(17) One (1) Lifeline discount is allowed per household. The FCC defines "household" as any individual or group living together at the same address as one (1) economic unit. (N)
(N)

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
4th Revised Sheet 7
Canceling 3rd Revised Sheet 7

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BASIC LOCAL EXCHANGE SERVICE

E. LOCAL EXCHANGE EXCEPTIONS (cont'd)

1. Lifeline Assistance (cont'd)

c. Rates and Charges

- (1) A total monthly credit in the amount of \$12.75 will apply to the eligible Lifeline Assistance subscriber's monthly local service bill as follows:

| | Monthly Credit |
|---|-------------------|
| Federal Credit to Residential Access Line | \$9.25 |
| State Credit to Residential Access Line | \$3.50 |
| Total Credit | \$12.75 |

(C)
|
(C)

- (2) For those existing customers who qualify for, and wish to change to, the Florida Lifeline Assistance Program, no service charges shall apply.
- (3) All recurring and nonrecurring charges for any service ordered by the subscriber shall be billed at the tariffed rates.
- (4) When a customer is no longer eligible for Lifeline Assistance, the Lifeline Assistance credit amount specified in (1) preceding, will be discontinued. Thereafter, transitional and regular tariffed rates and charges as applicable will apply.

2. Transitional Lifeline Assistance

a. General

- (1) Transitional Lifeline Assistance is a state program which provides for discounted residential basic local telecommunications service at seventy percent (70%) of the residential local telecommunications service rate for any Lifeline Assistance subscriber who no longer qualifies for Lifeline Assistance.

b. Regulations

- (1) A Lifeline Assistance subscriber who requests Transitional Lifeline Assistance shall receive the discounted rate for a period of one (1) year after the date the subscriber ceases to be qualified for the Lifeline Assistance Program.

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
2nd Revised Sheet 8
Canceling 1st Revised Sheet 8

ISSUED: April 1, 2004
BY: JAMES T. SCHUMACHER-
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BASIC LOCAL EXCHANGE SERVICE

F. EXTENDED CALLING SERVICE (ECS)

1. General

- a. Except as otherwise provided in Section A3.B.3.a.(4)(a) of this Tariff, Extended Calling Service (ECS) provides per message and usage based charges and billing for customer dialed or operator assisted calls to selected Extended Calling Service (ECS) exchanges located outside of a customer's normal flat rate service local Equal Access Calling (EAS) area, from the Telephone Company exchanges specified in Section F.2. below. (T)
- b. Extended Calling Service (ECS) is provided by the Telephone Company between the Telephone Company exchanges and the Extended Calling Service (ECS) exchanges specified in Section F.2. below, subject to the availability of facilities and billing capabilities.
- c. Extended Calling Service (ECS) will apply to all Business and Residence access lines, PBX trunks, Key main access lines, Foreign Exchange (FX) Service, Remote Call Forwarding lines, access lines provided in connection with Digital Centrex Service, access lines provided in connection with Shared Tenant Service (STS), access lines provided in connection with Switched 56 KBPS Service; access lines provided in connection with Integrated Services Digital Network (ISDN); and access lines provided in connection with Pay Telephone Service (PATS), within the Telephone Company exchanges where the respective service is available.
- d. Calls made between Extended Calling Service (ECS) route exchanges will be considered local calls.
- e. Extended Calling Service (ECS) calls should be dialed as local calls where the involved Telephone Company exchange and the Extended Calling Service (ECS) exchange are in the same Numbering Plan Area (NPA) or area code. Where the Telephone Company exchange and the Extended Calling Service (ECS) exchange are located in different NPA's or area codes, such calls should be dialed as ten digit local calls due to NXX code conflicts.
- f. Except as otherwise provided in Section A3.B.3.a.(4)(a) of this Tariff, the charges for Extended Calling Service (ECS) usage shall be those shown in F.3. below. (T)

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
1st Revised Sheet 9
Canceling Original Sheet 9

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BY: JAMES T. SCHUMACHER-
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BASIC LOCAL EXCHANGE SERVICE

F. EXTENDED CALLING SERVICE (ECS) (cont'd)

2. Extended Calling Service (ECS) Exchanges

- a. Listed below are the Extended Calling Service (ECS) exchanges associated with each Telephone Company exchange:

| Telephone Company Exchanges | Extended Calling Service (ECS) Exchanges |
|--------------------------------|--|
| Celebration | Haines City Haines City (Poinciana) |
| Lake Buena Vista | Haines City Haines City (Poinciana) |

3. Usage Charges

- a. Station-to-Station rates for calls to the Extended Calling Service (ECS) exchanges.

| | | |
|---|--------|-----|
| 1. Residential - per message charge, unlimited duration | \$.26 | (I) |
| 2. Business - per minute of use charge, | | |
| Initial Minute of Use or Fraction Thereof | \$.10 | |
| Additional Minute of Use, Each or Fraction Thereof | \$.06 | |

- b. For Operator Assisted Local Calls, the appropriate operator service charges in Section A3.D.3. of this Tariff are applicable in addition to the Station-to-Station usage charges above.

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
Original Sheet 10

ISSUED: July 1, 2002
BY: JAMES T. SCHUMACHER-
VICE PRESIDENT

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BASIC LOCAL EXCHANGE SERVICE

G. VERIFICATION AND EMERGENCY INTERRUPT SERVICE

1. General

Verification and Emergency Interrupt Service is furnished where and to the extent that facilities permit. The customer shall indemnify and save the Company harmless against all claims that may arise from either party to the interrupted call or any person.

a. Verification Service

1. The Company furnishes Verification Service for the purpose of aiding subscribers with legitimate call completion problems. Upon request, the operator will verify and provide the line status condition of a local subscriber line.
2. A subscriber originated request for verification of a local number other than an emergency agency number is a chargeable Verification Service request. No charge applies if the line is out of order.

b. Emergency Interrupt Service

1. The Company furnishes Emergency Interrupt Service when a subscriber who has originated a Verification Service request to a line which has been found in a busy talking state informs the operator that an urgent or emergency situation exists and requests that the operator have the busy line cleared.
2. A subscriber originated request for Emergency Interrupt to a local number other than an emergency agency number is a chargeable Emergency Interrupt request.
3. An Emergency Interrupt requires a Verification. Both charges are applicable for an Emergency Interrupt request.

2. Application of Rates and Charges

- a. No charge will apply if the requesting customer identifies that the call is to or from an official public emergency agency. An official public emergency agency is defined as a government agency which is operated by the Federal, state or local government, and has the capability and legal authority to provide prompt and direct aid to the public in emergency situations. Such agencies include the local police, state police, fire department, licensed hospitals, etc.
- b. Charges may not be billed on a collect basis or on a third number basis to the number being verified or interrupted.

(N)

(N)

GENERAL EXCHANGE TARIFF

SMART CITY TELECOMMUNICATIONS LLC
D/B/A SMART CITY TELECOM

SECTION A3
Original Sheet 11

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BASIC LOCAL EXCHANGE SERVICE

G. VERIFICATION AND EMERGENCY INTERRUPT SERVICE (cont'd)

(N)

2. Application of Rates and Charges (cont'd)

- c. If the number verified is not in use, or as a result of interrupt the line is cleared, and at the calling party's request, the operator completes the call, the charges for Operator Assisted Local Calls as specified in this Section A3 of the Tariff apply in addition to the applicable verification and emergency interrupt charges.

1. Verification Service Request

Nonrecurring
Charge

- a. Each request

\$2.50

2. Emergency Interrupt Service Request

- a. Each request¹

\$2.50

(N)

¹ A charge for a verification request also applies.

(N)

REDACTED – FOR PUBLIC INSPECTION

SMART CITY TELECOMMUNICATIONS LLC (SAC 210330)

ATTACHMENT - LINE 3026

ATTACHMENT REDACTED IN ENTIRETY